

**BKV Operating LLC  
Pennsylvania Business Unit**

**40 CFR 60 SUBPART OOOOa  
ANNUAL REPORT**

**REPORTING PERIOD:**

8/3/2018

to

8/2/2019

**Date Report Prepared:**

October 2019

# 40 CFR 60 SUBPART OOOOa | ANNUAL REPORT

REPORTING PERIOD: 8/3/2018  
to  
8/2/2019

General Information	
Company Name: BKV Operating LLC	
Mailing Address	
Street: 12231 State Route 706	
City: Montrose	County: Susquehanna
State: Pennsylvania	Zip Code: 18801
Certifying Official	
Name: Heather Moyer	Title: Regulatory Manager
Email: <a href="mailto:heathermoyer@bkvoperating.com">heathermoyer@bkvoperating.com</a>	Phone: 570-278-7450
Report Preparer	
Name: Heather Moyer	Title: Regulatory Manager
Email: <a href="mailto:heathermoyer@bkvoperating.com">heathermoyer@bkvoperating.com</a>	Phone: 570-278-7450
Included in this report?	
<b>Affected Facilities</b>	
Wells (Well Completion Operations)	Yes. BKV Operating LLC conducted well completion operations (i.e. flowbacks) during the reporting period that were subject to the requirements of Subpart OOOOa.
Centrifugal Compressors	No. BKV Operating LLC does not operate any centrifugal compressors.
Reciprocating Compressors	No. BKV Operating LLC does not operate any reciprocating compressors that are subject to Subpart OOOOa.
Continuous Bleed Pneumatic Controllers	No. BKV Operating LLC does not use continuous bleed natural gas driven controllers that operate at a natural gas bleed rate greater than 6 scfh.
Natural Gas Driven Diaphragm Pneumatic Pumps	Yes. BKV Operating LLC did operate natural gas driven diaphragm pneumatic pumps during the reporting period that are subject to the requirements of Subpart OOOOa.
Fugitive Emissions Components at Well Sites	Yes. BKV Operating LLC did operate well sites during the reporting period that are subject to the LDAR requirements of Subpart OOOOa.
Fugitive Emissions Components at Compressor Stations	No. BKV Operating LLC does not operate any compressor stations that are subject to the LDAR requirements of Subpart OOOOa.
Storage Vessels	No. BKV Operating LLC does not operate any storage vessels that are subject to the requirements of Subpart OOOOa.

## Certification

I hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

\_\_\_\_\_  
Heather Moyer  
Name of Certifying Official

\_\_\_\_\_  
Regulatory Manager  
Title

\_\_\_\_\_  
*Heather Moyer*  
Signature of Certifying Official

\_\_\_\_\_  
10/22/2019  
Date signed

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Company Name: BKV Operating LLC  
Affected Facility: Wells

Gas Well Affected Facility Identification	Affected Facility Address	API Well Number	Latitude	Longitude	Well Category	Gas or Oil Well	Date and Time of Start of Flowback	Date and Time of End of Flowback	Date and Time of Each Occurrence of Flowback Stage	Date and Time of End of Flowback	Description of Start of Flowback (Well shut in or Start of Production)	Flowback Duration (hrs)	Disposition of Recovery	Duration of Recovery of Gas to Flow Line (hrs)	Combustion Duration (hrs)	Venting Duration (hrs)	Primary Compliance Method	If using combustion as the "Primary Compliance Method", is an exemption being claimed under §60.575d(4)(3). If Yes, detail below.	Are there deviations from §60.575a? If Yes, detail below.
Frystak Well Pad - Well 1H	904 Bush Rd L, Montrose, PA 18801	37-115-20836	41.86039	-75.91980	Production	Gas	9/25/2018 11:00	9/26/2018 9:00	None	9/26/2018 9:00	Start of Production	22	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No
Frystak Well Pad - Well 2H	904 Bush Rd L, Montrose, PA 18801	37-115-20839	41.86012	-75.91976	Production	Gas	9/25/2018 11:00	9/26/2018 22:50	None	9/26/2018 22:50	Start of Production	12	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No
Frystak Well Pad - Well 3H	904 Bush Rd L, Montrose, PA 18801	37-115-20840	41.86014	-75.91972	Production	Gas	9/25/2018 11:00	9/26/2018 9:00	None	9/26/2018 9:00	Start of Production	22	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No
Frystak Well Pad - Well 4H	904 Bush Rd L, Montrose, PA 18801	37-115-20835	41.86023	-75.91960	Production	Gas	9/25/2018 11:00	9/27/2018 11:00	None	9/27/2018 11:00	Start of Production	46	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No
Frystak Well Pad - Well 4H	904 Bush Rd L, Montrose, PA 18801	37-115-20839	41.86036	-75.91945	Production	Gas	9/25/2018 14:00	9/27/2018 11:00	None	9/27/2018 11:00	Start of Production	45	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No
Marshall Well Pad - Well Keystone 1H	43 Eads Road, Tunkhannock, PA 18657	37-131-20486	41.60411	-76.00549	Production	Gas	3/26/2019 6:00	3/30/2019 12:40	None	3/30/2019 12:40	Start of Production	29	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No
Marshall Well Pad - Well Marshall 3H	43 Eads Road, Tunkhannock, PA 18657	37-131-20487	41.60411	-76.00549	Production	Gas	4/15/2019 22:00	4/16/2019 16:00	None	4/16/2019 16:00	Start of Production	18	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No
PAC Warehouse Well - Pad - Marshall 4H	120 PAC Warehouse Way, Tunkhannock, PA 18657	37-131-20534	41.60077	-76.01466	Production	Gas	5/12/2019 18:00	5/14/2019 7:30	None	5/15/2019 10:15	Start of Production	21	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No
PAC Warehouse Well - Pad - 2H	120 PAC Warehouse Way, Tunkhannock, PA 18657	37-131-20535	41.60081	-76.01465	Production	Gas	5/29/2019 14:05	5/29/2019 14:05	None	5/29/2019 14:05	Start of Production	0	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No
PAC Warehouse Well - Pad - McCarthy 2H	120 PAC Warehouse Way, Tunkhannock, PA 18657	37-131-20536	41.60073	-76.01466	Production	Gas	5/29/2019 9:10	5/29/2019 11:55	None	5/29/2019 11:55	Start of Production	3	Recovery to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Completion	N/A	No

Flowback (Wells)

Company Name: BKV Operating LLC  
Affected Facility: Wells

Gas Well Affected Facility Identification	Affected Facility Address	API Well Number	Latitude	Longitude	Well Category	Gas or Oil Well	Date and Time of Start of Flowback	Date and Time of Direct Flowback to Separator	Date and Time of Each Occurrence of Returning to Initial Flowback Stage	Date and Time of End of Flowback	Description of End of Flowback (Well Shut In or Start of Production)	Flowback Duration (hrs)	Disposition of Recovery	Duration of Recovery of Gas Flow Line (hrs)	Combustion Duration (hrs)	Venting Duration (hrs)	Primary Compliance Method	If using combustion as the "Primary Compliance Method," is an exemption being claimed under §60.5754(a)(5). If Yes, detail below.	Are there deviations from §60.5754? If Yes, detail below.
Johnston Well Pad - between 2H	407 Snake Road, Meshoppen, PA 16860	37-131-205/3	41.66741	-76.0286	Production	Gas	6/3/2019 18:20	6/4/2019 15:30	None	6/4/2019 15:30	Start of Production	21	Routed to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Competition	N/A	No
Johnston Well Pad - McCarthy 1H	407 Snake Road, Meshoppen, PA 16860	37-131-205/4	41.66742	-76.0286	Production	Gas	6/3/2019 12:00	6/4/2019 11:00	None	6/4/2019 11:00	Start of Production	23	Routed to flow line (sales)	Immediate recovery of gas to sales after initial flowback stage	0	0	Reduced Emission Competition	N/A	No

Details of Exemptions or Deviations

Gas Well Affected Facility Identification	Detailed Information of Deviation or Exemption Claimed under 60.5754(a)(3)
None	



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**Company Name:** BKV Operating LLC  
**Affected Facility:** Collection of Fugitive Emissions Components at Well Sites

Well Site Affected Facility Identification	Facility Location	Date and Time of Start of Inspection	Date and Time of End of Inspection	Name of Personnel Conducting the Inspection	Years of Experience of Personnel Conducting the Inspection	Training of Personnel Conducting the Inspection	Monitoring Instrument Used (Make, Model, Serial Number)	Ambient Conditions (Temperature °F, Medium Wind Speed, Sky Condition)	Number and Type of Leaks Detected	Number and Type of Fugitive Emissions Components Not Repaired per §60.5397(a)(b)	Number and Type of Difficult-to- Monitor Equipment Monitored	Number and Type of Unusable Equipment Monitored	Date of Successful Repair or Leaking Component(s)	Instrument Used to Verify a Reported Leaking Component that Could Not Be Repaired During the Initial Leak Detection Finding	Number and Type of Leaking Components Placed on Delay or Repair Laid and Explanation for the Delay of Repair	Deviations from the Monitoring Plan or a Statement that there were No Deviations from the Monitoring Plan
Racti Well Pad	1084 Coleman Rd, Montrose, PA 18801	9/11/18 10:10	9/11/18 10:55	Netissa (Self-ins)	6	FLIR Certified	FLIR Gasfinder GF-320 S/N 44002189	Cloudy, Temp 69 F, Wind Speed 1 mph	1 - Connector 1 - PRV 1 - Valve	0	0	0	Within 15 calendar days of leak detection	Bubble Method	0	None
P&G 4 Well Pad	5305 & 5307 State Route 87, Tunkhannock, PA 18657	9/11/18 11:55	9/11/18 14:25	Netissa (Self-ins)	6	FLIR Certified	FLIR Gasfinder GF-320 S/N 44002189	Cloudy, Temp 69 F, Wind Speed 1 mph	0	N/A	0	0	N/A	N/A	N/A	None
Frysak Well Pad	664 Bush Rd 1, Montrose, PA 18801	10/30/18 10:25	10/30/18 12:05	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 44002189	Cloudy, Temp 15 F, Wind Speed 0.6 mph	4 - Valves	0	0	0	Within 15 calendar days of leak detection	Bubble Method	0	None
Minkell Well Pad	41 Ralls Road, Tunkhannock, PA 18657	10/30/18 12:53	10/30/18 14:43	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 44002189	Cloudy, Temp 15 F, Wind Speed 0.6 mph	1 - Valve 2 - Connectors	0	0	0	Within 15 calendar days of leak detection	Bubble Method	0	None
P&G Warehouse Well Pad	130 P&G Warehouse Way, Tunkhannock, PA 18657	10/30/18 15:00	10/30/18 15:50	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 44002189	Cloudy, Temp 15 F, Wind Speed 0.6 mph	1 - Valve	0	0	0	Within 15 calendar days of leak detection	Bubble Method	0	None
Johnston Well Pad	407 Stuart Road, Nesbrough, PA 18630	10/30/18 16:00	10/30/18 17:01	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 44002189	Cloudy, Temp 15 F, Wind Speed 0.6 mph	2 - Valves 1 - Connector	0	0	0	Within 15 calendar days of leak detection	Bubble Method	0	None
Racti Well Pad	1089 Coleman Rd, Montrose, PA 18801	1/17/19 11:30	1/17/19 12:19	Netissa (Self-ins)	1	FLIR Certified	FLIR Gasfinder GF-320 S/N 210049	Cloudy, Temp 19 F, Wind Speed 2.4 mph	1 - Connector	0	0	0	Within 15 calendar days of leak detection	N/A	0	None
P&G 4 Well Pad	5305 & 5307 State Route 87, Tunkhannock, PA 18657	1/18/19 7:15	1/18/19 8:05	Netissa (Self-ins)	1	FLIR Certified	FLIR Gasfinder GF-320 S/N 210049	Cloudy, Temp 25 F, Wind Speed 1.7 mph	0	N/A	0	0	N/A	N/A	N/A	None
Frysak Well Pad	664 Bush Rd 1, Montrose, PA 18801	4/9/19 11:35	4/9/19 12:25	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 210049	Cloudy, Temp 57 F, Wind Speed 2.4 mph	1 - Valve	0	0	0	Within 15 calendar days of leak detection	Bubble Method	0	None
Minkell Well Pad	43 Bails Road, Tunkhannock, PA 18657	4/9/19 13:05	4/9/19 14:40	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 210049	Cloudy, Temp 20 F, Wind Speed 3.5 mph	1 - Connector	0	0	0	Within 15 calendar days of leak detection	N/A	0	None
Minkell Well Pad	43 Bails Road, Tunkhannock, PA 18657	5/28/19 13:15	5/28/19 16:30	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 210049	Cloudy, Temp 78 F, Wind Speed 3.1 mph	1 - Connector	0	0	0	Within 15 calendar days of leak detection	N/A	0	None
P&G Warehouse Well Pad	120 P&G Warehouse Way, Tunkhannock, PA 18657	7/1/19 15:45	7/1/19 16:40	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 210049	Cloudy, Temp 82 F, Wind Speed 1.3 mph	0	N/A	0	0	N/A	N/A	N/A	None
Johnston Well Pad	407 Stuart Road, Nesbrough, PA 18630	7/1/19 16:50	7/1/19 17:50	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 210049	Cloudy, Temp 83 F, Wind Speed 1.7 mph	1 - Valve	0	0	0	Within 15 calendar days of leak detection	N/A	0	None
Racti Well Pad	1086 Coleman Rd, Montrose, PA 18801	7/2/19 8:45	7/2/19 9:20	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 210049	Cloudy, Temp 64 F, Wind Speed 0.5 mph	0	N/A	0	0	N/A	N/A	N/A	None
P&G 4 Well Pad	5305 & 5307 State Route 87, Tunkhannock, PA 18657	7/2/19 9:50	7/2/19 10:20	Netissa (Self-ins)	2	FLIR Certified	FLIR Gasfinder GF-320 S/N 210049	Cloudy, Temp 65 F, Wind Speed 1.7 mph	0	N/A	0	0	N/A	N/A	N/A	None

Fugitives (Weiba)

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Company Name:  
Affected Facility:

BKV Operating LLC  
Natural Gas Driven Pneumatic Pumps (Diaphragm)

Pump ID	Current Pump Location and Address	Was the pneumatic pump constructed, modified, or reconstructed during the reporting period?	What condition does the pneumatic pump meet? [§60.5420a(b)(9)(i)]	Has the pneumatic pump affected facility been previously reported under §60.5420a(b)(9)(i), and has a change in its reported condition occurred during this reporting period? [§60.5420a(b)(9)(j)]	Date Previously Reported [§60.5420a(b)(9)(ii)]	Which condition does the pneumatic pump meet? [§60.5420a(b)(9)(ii)]	Did any deviations in cases where the pneumatic pump was not operated in compliance with the requirements specified in §60.5393a? [§60.5420a(b)(9)(iii)]
Graco Pump D53388, HTP103	McCormell Well Pad 133 Dark Hollow Road Tunkhannock, PA 18657	No. Pump HTP103 was purchased in 2016 by the previous owner and used at a different location. It was then moved to the McCormell Well Pad in October 2018 to replace a different pump of the same make/model that was removed in January 2018.	A process is available on-site and BKV has determined, in accordance with §60.5393(b)(5), that it is technically infeasible to capture and route the emissions to the process. There is no control device on-site.	No	N/A	N/A	No
Graco Pump D53388, HTP104	Ruark Well Pad 5887 State Route 87 Tunkhannock, PA 18657	No. Pump HTP104 was purchased in 2016 by the previous owner and used at a different location. It was then moved to the Ruark Well Pad in October 2018 to replace a different pump of the same make/model that was removed in January 2018.	A process is available on-site and BKV has determined, in accordance with §60.5393(b)(5), that it is technically infeasible to capture and route the emissions to the process. There is no control device on-site.	No	N/A	N/A	No